Exhibit B

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8	Attorneys for Plaintiffs [Additional counsel listed on signature page]			
9	UNITED STATES DISTRICT COURT			
10	NORTHERN DISTRICT OF CALIFORNIA			
11	BRUCE MACDONALD, Individually and	Case No. 3:17-cv-07095-RS		
12	on Behalf of All Others Similarly Situated,	CLASS ACTION		
13	Plaintiff,	PLAINTIFFS' NOTICE OF DEPOSITION		
14	v. (OF DEFENDANT DYNAMIC LEDGER SOLUTIONS, INC. PURSUANT TO		
15	DYNAMIC LEDGER SOLUTIONS, INC.,	FEDERAL RULE OF CIVIL PROCEDURE 30(b)(6)		
16	a Delaware corporation, TEZOS STIFTUNG, a Swiss Foundation,			
17	KATHLEEN BREITMAN, an			
18	Individual, ARTHUR BREITMAN, an Individual, TIMOTHY COOK			
19	DRAPER, an individual, DRAPER ASSOCIATES, JOHANN GEVERS,			
	DIEGO PONZ, GUIDO SCHMITZ-			
20	KRUMMACHER, BITCOIN SUISSE AG, NIKLAS NIKOLAJSEN and DOES 1-100,			
21	INCLUSIVE,			
22	Defendants.			
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Case 3:17-cv-07095-RS Document 57-2 Filed 01/10/18 Page 3 of 6

1 PLEASE TAKE NOTICE that, pursuant to Rules 30 and 45 of the Federal Rules of Civil 2 Procedure, Plaintiffs in the above-captioned action, by its counsel, will take the oral deposition of 3 Defendant Dynamic Ledger Solutions, Inc. regarding the subject matters set forth in the attached 4 Schedule B, which shall be interpreted in accordance with the definitions and instructions set forth in 5 Schedule A. 6 The deposition shall commence at 10:00 a.m. on March 1, 2018 at the Berkeley offices of 7 Hagens Berman Sobol Shapiro LLP, or at such other time and location as agreed upon by counsel, 8 and continuing thereafter until completed. The deposition will be recorded by stenographic means. 9 By February 26, 2018, Defendant Dynamic Ledger Solutions, Inc. shall provide a written 10 designation of the name(s) and position(s) of the one or more officers, directors, or managing agents, 11 or other persons who will be produced to testify on Dynamic Ledger Solutions, Inc.'s behalf concerning the matters set forth in Schedule B. Pursuant to Federal Rule of Civil Procedure 12 13 30(b)(6), the person(s) designated by Dynamic Ledger Solutions, Inc. should be prepared to testify to 14 such matters known or reasonably available to Dynamic Ledger Solutions, Inc. The person testifying 15 shall bring to the deposition, or produce beforehand, all documents reviewed, relied upon or considered in preparation of the deposition. 16 17 DATED: January 10, 2018 Respectfully submitted, 18 HAGENS BERMAN SOBOL SHAPIRO LLP 19 20 By: /s/ Reed R. Kathrein 21 Reed R. Kathrein (139304) Peter E. Borkon (212596) 22 Danielle Charles (291237) 715 Hearst Ave., Suite 202 23 Berkeley, CA 94710 Telephone: (510) 725-3000 24 Facsimile: (510) 725-3001 25 Email: reed@hbsslaw.com peterb@hbsslaw.com 26 daniellec@hbsslaw.com 27

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Case 3:17-cv-07095-RS Document 57-2 Filed 01/10/18 Page 4 of 6

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SCHEDULE A

DEFINITIONS AND INSTRUCTIONS

- 1. "Defendants" "you" or "your" refers to Dynamic Ledger Solutions, Inc., Tezos Stiftung, Kathleen Breitman, Arthur Breitman, Timothy Cook Draper, Draper Associates, Johann Gevers, Diego Ponz, Guido Schmitz-Krummacher, Bitcoin Suisse AG, and Niklas Nikolajsen. All references to the "Breitmans" (plural) refer to both Defendant Kathleen Breitman and Defendant Arthur Breitman.
- 2. "Communication" or "communications" refers to every manner or means of disclosure, transfer or exchange of information (in the form of facts, ideas, inquiries or otherwise), whether orally, electronically, by document, telecopier, mail, personal delivery or otherwise.
- 3. The "Complaint" refers to Plaintiffs' Class Action Complaint for Violations of California Corporations Code § 25110 and California's Unfair Competition Laws (Dkt. No. 1) in the above-captioned case. All paragraph references herein are to the Complaint.
- 4. "DLS," or "Dynamic Ledger Solutions" refers to defendant Dynamic Ledger Solutions, Inc. and its parents, subsidiaries, predecessors, successors, divisions, affiliates, operating units, controlling persons, controlled persons, officers, directors, employees, representatives or agents.
- 5. "ICO Proceeds" refers to all funds collected via or derived from the Tezos Initial Coin Offering (the "ICO" or "Tezos ICO").
- 6. "Putative Class," "Member of Putative Class," or "Putative Class Member," as defined in ¶1 of the Complaint, refers to:

[A]ll persons who purchased Tezos tokens (aka "XTZ", "Tezzies" or "tez") by contributing fiat currency (e.g., U.S. Dollars) or other consideration (including the blockchain-based digital currencies bitcoin (BTC) and/or Ethereum ("ETC" or "ether")) to the Tezos "Initial Coin Offering" ("ICO") in July 2017.

7. "Tezos Stiftung", "Tezos Foundation", or the "Foundation" refers to Defendant Tezos Stiftung and its parents, subsidiaries, predecessors, successors, divisions, affiliates, operating units, controlling persons, controlled persons, officers, directors, employees, representatives or agents.

1	8.	These requests are being made on an expedited basis, and Plaintiff reserves all rights to	
2	supplement these requests in the ordinary course.		
3	SCHEDULE B		
4	TOPICS FOR DEPOSITION		
5	1.	ICO Proceeds (including how and in what form those proceeds were obtained, where	
6	those proceeds exist, how and for what purpose they have been transferred since they were obtaine		
7	the process by which they may be transferred or exchanged, the processes and procedures for		
8	safekeeping those proceeds, and recordkeeping related to those proceeds).		
9	2.	Any documents relating to the results of any audits of Defendant DLS.	
10	3.	The capital structure of Dynamic Ledger Solutions.	
11	4.	The formation and governance of DLS.	
12	5.	The basis of, the allegations by the Breitmans against Johann Gevers as alleged in ¶	
13	102-103 of the Complaint.		
14	6.	The 46-page letter referenced in ¶ 103 of the Complaint.	
15	7.	Gevers' allegations that the "Breitmans have been trying to control the foundation as i	
16	it were their own private entity by bypassing the foundation's legal structure and interfering with		
17	management and operations" and of the Breitmans "illegal coup" as alleged in ¶ 104 of the Complain		
18	8.	Communications between the Breitmans and/or DLS and the Foundation since the ICO	
19	9.	Any agreements between DLS and the Foundation.	
20	10.	DLS' role in the formation or creation of the Foundation.	
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